

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF ILLINOIS**

MIGUEL VAZQUEZ, #Y34806,)
Plaintiff,)
-vs-) No. 23-cv-03050-NJR
JASON CHAUSSE, et al.,)
Defendants.)

MOTION FOR HIPAA QUALIFIED PROTECTIVE ORDER

NOW COMES the Defendant, JASON CHAUSSE, by and through his attorney, KWAME RAOUL, Attorney General of the State of Illinois, and for his Motion for a HIPAA Qualified Protective Order states as follows:

1. Plaintiff filed this cause of action in which he has put his medical condition and treatment issue, and, therefore, such may be used as evidence in this case. (Doc. 1).

2. Pursuant to 45 C.F.R. 164.512 of the Health Insurance Portability and Accountability Act (HIPAA), a HIPAA Qualified Protective Order is necessary to allow the parties to this litigation to obtain and use protective health information contained in the Plaintiff's medical records, and information on Plaintiff's medical conditions that may have been reported to local and/or State public health authorities, for the purpose of this litigation while preventing unauthorized disclosure of said protected health information.

3. A HIPAA Qualified Protective Order should be entered to safeguard the protected health information from unauthorized disclosures while still permitting its use solely for purposes of this litigation.

4. Pursuant to this Court's rules, the proposed HIPAA Qualified Protective Order will be submitted to the Court's proposed document inbox and sent via U.S. Mail to the *pro se* Plaintiff.

WHEREFORE, for the aforementioned reasons, Defendant respectfully requests that this Court enter a HIPAA Qualified Protective Order, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

JASON CHAUSSE,

Defendant,

Peter Quigley #6344324
Assistant Attorney General
500 South Second Street
Springfield, IL 62701
(217) 557-7081 Phone
(217) 782-8767 Fax
Email: Peter.Quigley@ilag.gov
& gls@ilag.gov

KWAME RAOUL, Attorney General,
State of Illinois,

Attorney for Defendant,

BY: s/Peter Quigley
Peter Quigley #6344324
Assistant Attorney General

**IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF ILLINOIS**

MIGUEL VAZQUEZ, #Y34806,)
Plaintiff,)
-vs-) No. 23-cv-03050-NJR
JASON CHAUSSE, et al.,)
Defendants.)

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2023, the foregoing document, Motion for HIPAA Qualified Protective Order, was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

None

and I hereby certify that on the same date, I caused a copy of the document to be mailed by United States Postal Service to the following non-registered participant:

Miguel Vazquez, #Y34806
Menard Correctional Center
Individual in Custody LEGAL Mail/Parcels
711 Kaskaskia Street
PO Box 1000
Menard, IL 62259

Respectfully submitted,

By: s/Peter Quigley
Peter Quigley #6344324
Assistant Attorney General
500 South Second Street
Springfield, IL 62701
(217) 557-7081 Phone
(217) 782-8767 Fax
Email: Peter.Quigley@ilag.gov
& gls@ilag.gov